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   (formerly, Sullivan Law Offices)
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   Attorneys for Counterdefendants,
7
   PINION RANCH ESTATES LLC,
   and VGR LIMITED PARTNERSHIP
8
9
10
                      UNITED STATES DISTRICT COURT
11
                           DISTRICT OF NEVADA
12
13
   UNITED STATES OF AMERICA,
                                 Case No: 3:73-cv-00127-RCJ-WGC
15
             Plaintiff,
                                     IN EQUITY NO. C-125
16
   WALKER RIVER PAIUTE TRIBE,
                                     SUBFILE NO. C-125-B
17
             Plaintiff-Intervenor,
                                     EX PARTE MOTION FOR ORDER OF
        vs.
                                     REMOVAL FROM SERVICE LIST AND
18
                                     TERMINATION AS ATTORNEYS OF
   WALKER RIVER IRRIGATION
                                     RECORD
19
   DISTRICT, a corporation, et
                                     DECLARATION OF J. D. SULLIVAN
   al.,
20
             Defendants.
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22
        Come now, J. D. Sullivan and Gene Kaufmann, Sullivan Law
23
   ("Sullivan Law" formerly known as Sullivan Law Offices), counsel
   of record for Counterdefendants, PINION RANCH ESTATES LLC
   ("Pinion"), and VGR LIMITED PARTNERSHIP (VGR"), and seek an order
25
   for removal of Sullivan Law as counsel from the ECF service list
26
27
   and termination as attorneys of record for said parties.
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MEMORANDUM OF POINTS AND AUTHORITIES

1. These Parties No Longer Have Any Legal Interest In This Case.

Counsel filed a similar motion in 3:73-cv-00125-RCJ-WGC (No. 1312 therein) and has submitted a proposed Order (No. 1339 therein).

The grounds for this motion are the same: Pinion has been dissolved by the Nevada Secretary of State (in 2012), and VGR no longer owns any land affected by the water rights issues herein. Per the attached Declaration of J. D. Sullivan, ex parte relief is compelling, in that the aforesaid parties have either been dissolved or have no substantial interest in this case, and judicial resources are therefore being wasted by further service of filings upon, and involvement of, Sullivan Law. LR 7-5(a).

2. Conclusion.

Wherefore, Sullivan Law respectfully requests this court's order removing Sullivan Law from the ECF service list and terminating Sullivan Law as attorney of record for said parties. A proposed order is being lodged herewith.

Dated: May 26, 2015 SULLIVAN LAW
A Professional Corporation

By: /s/ J. D. Sullivan
Attorneys for Counterdefendants,
PINION RANCH ESTATES LLC and VGR
Limited Partnership

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1 DECLARATION OF J. D. SULLIVAN 2 3 State of Nevada ss. County of Douglas 4 5 I, J. D. Sullivan, declare as follows: 6 I have personal knowledge of the matters stated herein. 7 If called, I could competently testify thereto. 8 The aforementioned Pinion was dissolved in 2012, by the 2. 9 Nevada Secretary of State, and I am informed that VGR no longer 10 owns any land affected by the water rights issues in this action. 11 Thus, the aforesaid parties have either been dissolved 3. 12 or have no substantial interest in this case, and judicial 13 resources are being wasted by further service upon, and 14 involvement of, Sullivan Law. 15 I declare under penalty of perjury that the foregoing is 16 true and correct. 17 Dated: May 26, 2015 /s/ J. D. Sullivan 18 19 20 21 22 23 24 25 26 27 28

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CERTIFICATE OF ELECTRONIC SERVICE AND ATTESTATION TO CONSENT

The undersigned Filing User hereby certifies that the within document was served under the court's ECF system upon the parties whose counsel of record herein are Filing Users and that such Filing Users have consented to electronic service.

Dated: May 26, 2015 SULLIVAN LAW

A Professional Corporation

/s/ J. D. Sullivan By:

Attorneys for Counterdefendants, PINION RANCH ESTATES LLC and VGR

Limited Partnership